

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

TODD C. BANK, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

-against-

COGINT, INC., FLUENT, INC, FLUENT, LLC, and
REWARD ZONE USA, LLC,

Defendants.

1:18-cv-03307-WFK-PK

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and all other pleadings and proceedings herein, Plaintiff, Todd C. Bank, will move this Court, on a date and at a time to be designated by the Court, before William F. Kuntz, II, United States District Judge, for an Order: (i) striking, pursuant to Rule 12(f)(2) of the Federal Rules of Civil Procedure, portions of the Answer (Dkt. No. 10), to the Complaint (Dkt. No. 1), of Defendants, Cogint, Inc., Fluent, Inc, Fluent, LLC, and Reward Zone USA, LLC; and (ii) granting, to Plaintiff, any other lawful and proper relief.

Dated: August 31, 2018

Respectfully submitted,

s/ **Todd C. Bank**
TODD C. BANK
ATTORNEY AT LAW, P.C.
119-40 Union Turnpike, Fourth Floor
Kew Gardens, New York 11415
(718) 520-7125
By Todd C. Bank

Counsel to Plaintiff

TO: KLEIN MOYNIHAN TURCO LLP
450 Seventh Avenue
New York, New York 10123
(212) 246-0900

Counsel to Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of this document is being filed electronically on August 31, 2018, via the Court's electronic-case-filing (ECF) system. Notice of this filing will be sent by the Court's ECF system to all parties, and copies will be mailed to those parties, if any, that are not served in such manner.

Dated: August 31, 2018

s/ Todd C. Bank

Todd C. Bank